

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Linda C. Parker, Debtor, PNC Bank, National Association, its successors and/or assigns, Movant, v. Linda C. Parker, Respondent.) Bankruptcy Case No. 24-20404-CMB)) Chapter 11)) Related Document No. 124-123)) Hearing Date: 08/12/25 @ 1:30 p.m.) Responses Due: 08/01/25)) Document No.

**RESPONSE TO MOTION OF PNC BANK, NATIONAL ASSOCIATION, ITS
SUCCESSORS, AND/OR ASSIGNS FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362 PURSUANT TO BANKRUPTCY RULE 4001**

AND NOW, comes the Debtor and Debtor-in-Possession, Linda C. Parker, by and through her counsel of record, Calaiaro Valencik, and presents the following Response to PNC Bank, National Association's Motion for Relief From the Automatic Stay Under Section 362 Pursuant to Bankruptcy Rule 4001, and presents the following in support:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied; the Debtor wishes to retain this property. It is necessary to an effective reorganization.
5. Denied; the Debtor understands PNC's claim. the Debtor expects to obtain a ledger of activity and verify the balance.
6. The Debtor has been in contact with the lender and is attempting to resolve this issue.
7. The Debtor is aware of the additional claim for legal fees authorized by the loan documents.

8. Denied; Denied; the Debtor understands PNC's claim. the Debtor expects to obtain a ledger of activity and verify the balance. The Debtor has systematically paid the monthly payment.

9. The Debtor valued this property at \$ 125,000.00 in its schedule A.

10. Admitted.

11. Admitted.

12. The Foreclosure was stayed by this chapter 11 case.

13. Denied; this property is necessary to her reorganization. This property is her home where she resides.

14. The Debtor is willing to cure the default and make future monthly payments. The Debtor has been in contact with the lender on the commercial mortgage and is attempting to resolve this issue.

15. The Debtor reserves all rights to verify any additional amounts due.

WHEREFORE, the Debtor respectfully requests that this Honorable Court deny PNC Bank, National Association's Motion for Relief From the Automatic Stay Under Section 362 Pursuant to Bankruptcy Rule 4001.

Respectfully submitted,

DATE: August 4, 2025

CALAIARO VALENCIK

BY: /s/ Donald R. Calaiaro
Donald R. Calaiaro, Esq. PA I.D. No. 27538

555 Grant Street, Suite 300
Pittsburgh, PA 15219
Phone: (412) 232-0930
Fax: (412) 232-3858
Email: dcalaiaro@c-vlaw.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) **Bankruptcy Case No. 24-20404-CMB**
Linda C. Parker,)
) **Chapter 11**
))
) **Related Document No. 124-123**
PNC Bank, National Association, its)
successors and/or assigns,)
) **Hearing Date: 08/12/25 @ 1:30 p.m.**
) **Responses Due: 08/01/25**
))
) **Document No.**
v.)
Linda C. Parker,)
))
) **Respondent.**)

**CERTIFICATE OF SERVICE of Response to Motion of PNC Bank, National
Association, its Successors and/or Assigns for Relief From the Automatic Stay
Under Section 362 Pursuant to Bankruptcy Rule 4001**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on August 4, 2025.

SERVICE BY FIRST-CLASS MAIL:

Linda C. Parker

SERVICE BY NEF:

Denise Carlon on behalf of Creditor PNC BANK, NATIONAL ASSOCIATION; dcarlon@kmllawgroup.com
Marta Elena Villacorta on behalf of U.S. Trustee Office of the United States Trustee;
marta.villacorta@usdoj.gov

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: Electronic Notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

Executed on: August 4, 2025

CALAIARO VALENCIK

/s/ Donald R. Calaiaro

Donald R. Calaiaro, Esq. PA I.D. No. 27538

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Pittsburgh, PA 15219
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